

IN THE UNITED STATES DISTRICT
COURT WESTERN DIVISION FOR THE
NORTHERN DISTRICT OF OHIO

Renz, et. al,
Plaintiff
Attorneys:
Thomas Renz (Bar ID 98645)
1907 W State St. #162
Fremont, OH 43420

&

Robert Gargasz (Bar ID 7136)
1670 Cooper Foster Park Rd.
Lorain, OH 44053

-VS-

State of Ohio, et. al

Defendant(s)

CASE NO. 3:20-cv-1948

JUDGE: Honorable Judge
James Carr

EXHIBIT J – Plaintiff
Affidavits

The following has been submitted by Plaintiff's attorney, Thomas Renz.

Respectfully submitted,

s/ Thomas Renz

ATTORNEY
Thomas Renz
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1907 W State St. #162
Fremont, OH 43420
Phone: 419-351-4248

Affidavit of

State of Ohio /

County: *Delaware*

I, Lisa Knapp, being first duly sworn according to law, state that I am legally competent to testify in this matter, and I have personal knowledge of all the facts contained within this affidavit. I am competent to testify as to all matters stated herein:

1. All documents attached to this affidavit are genuine copies of the original and are fully incorporated by reference herein as if fully rewritten herein. All Exhibits referenced and/or attached thereto and fully incorporated by reference herein are all true and genuine copies of the originals and each is incorporated herein as evidence in support of the plaintiff's motion. All documents as was filed in this matter attached to the complaint are also incorporated herein fully by reference by this affidavit as if fully and completely rewritten herein. This includes all documents contained in the Exhibits attached to the complaint as filed for record. All Exhibits referenced and/or attached thereto and fully incorporated by reference herein are in support my individual claims that my Constitutional Liberties, Freedoms and God given, absolute, fundamental, and inalienable Rights have been unconstitutionally infringed upon and denied and/or jeopardized to me as I detail herein.
2. The DeWine, Acton, Himes Orders as have been issued since March 2020 have adversely impacted my Constitutional Liberties, Freedoms and God given, absolute, fundamental, and inalienable Rights.
3. As a direct and proximate result of these unconstitutional orders and there mandated implementation, I have been made to endure:
4. The mandates and shutdowns issued by the State of Ohio have negatively affected every aspect of my life, shattered my sense of well-being, isolating me from people and activities I care about, and eliminated all sources of joy from my life. They have caused my son to suffer at school and personally.
5. I have experienced serious health issues from being unable to breath when wearing a cloth mask including lightheadedness, weakness, high blood pressure and rapid pulse, both when wearing one inside and when forced to wear one at my son's outdoor sports activities in 90+ degree weather.
6. On July 8, 2020, I experienced unprecedented and documented high blood pressure, rapid pulse and increased temperature after wearing a cloth mask prior to giving blood.
7. The governor has mandated the public to wear a mask when one leaves their home, so I have experienced "mask shaming" while out in public from others for not wearing a mask even when 6' apart from others outside, which they do not understand does not violate the mandate. I am then forced to explain myself at times, which has led to rude comments from strangers who tell me I should wear one anyway because they are.
8. As an extrovert who enjoys connecting with others using facial expressions and sometimes touch, it causes a great deal of stress for me to see others' faces covered up with worried eyes; it seems to me as though the world is coming to an end. Watching people jump to avoid others as though human contact will kill them is very unsettling to me, as is being unable to connect to others via a hug or touch, and has caused me anxiety.

9. The shutdowns and other mandates from the orders have forcibly isolated me from much of my prior life and caused me to be unsure of my future, my children's future, and the future of my country, causing me severe anxiety, depression, and feelings of extreme hopelessness and helplessness. The daily "drumbeat of death" provided from the State of Ohio and the media has caused depression and anxiety as well as a lack of a sense of purpose and hope. I feel trapped and as though all of my freedoms have been taken away from me, which has caused frustration and fear. I have experienced severe insomnia nearly every day since the shutdowns, and have had migraines at least twice a week due to the stress.

10. To relieve stress and stay in shape, I've played recreational soccer 4-5x week every week for 10 years, running 4 teams up until March when soccer was canceled. Soccer was a major part of my social life as well. The loss of this activity since March has been extremely harmful to my mental and physical health. I have also gained weight and I have little energy.

11. The shutdowns and other orders have caused my son Keegan, age 17, youngest of 3 boys, to change. He is a talented athlete and has wrestled year round since 2nd grade. He fought hard to get an alternate spot at States, only to see it shut down due to the orders. He also missed spring track, and hasn't wrestled since then.

12. Keegan lettered in every sport his freshman and sophomore year. He was taking a full course load of honors and AP classes, and a scholarship was possible. That opportunity seems to be gone now. It is impossible for a child to teach themselves, which is why we have teachers. Keegan's grades went from A's and B's to flunking every class during the 4th quarter shutdowns due to subpar online school. He failed one of the two AP courses he was doing so well in, and lost college credit as a result.

12. Being present at school in person is crucial due for Keegan's learning, and online school is absolutely useless to him. Participation in sports and seeing friends at school is a big part of this. Rather than participating in daily productive activities, Keegan has had nothing to do all day, leaving him frustrated and without goals. As a result of the shutdowns and mandates, Keegan has been depressed, anxious, feeling hopeless and very angry. He has lost much of his motivation and drive.

13. The rules that have been put in place for school and sports are unnatural and have caused Keegan anxiety as a result. Angry onlookers have called the school to complain about the kids supposedly not following some rules. It has caused a great deal of stress as they must watch every single thing they do at all times. It is simply too much for any child to have to deal with.

14. All sports camps and other camps have been canceled since the shutdowns in March. Keegan was not able to participate in any activities for 5 months that would further his skills, relieve stress, and increase his chance for a scholarship. And I have missed out watching my him wrestle and run, which are some of my most enjoyable activities.

15. On 5/17/20, our family dog Lucy Lu became very ill and I took her to the vet. The event was a terrible experience due to the all the State of Ohio restrictions, as I was forced to make quick decisions under input from a stranger I couldn't even see due to the restrictions. We only had 5 minutes to say goodbye, and only 2 family members were able to be there due to the State regulations. We were all wearing masks while very upset, but they weren't even allowed to provide tissues, and were treated with very little care or sympathy due to the restrictions being in place. The experience, my first, was very traumatic compared to how

vets normally handle putting a pet to sleep, which is with sensitivity and compassion. No family should have to experience that.

16. Our family spends a lot of time during the summer at the pool. Our community pool was closed due to the restrictions put into place by the State of Ohio. We suffered the loss of precious family time and bonding during my son's last summer of childhood.

17. The shutdowns have caused a great deal of divisiveness. Due to me being forced to factually contest and debunk the State's orders on a daily basis, I have permanently lost friends and even family members, who believe the State's false statements. This has included very close family members, who I have not seen since the shutdown due to their beliefs and fears.

18. When the shutdowns occurred, I had been pursuing a drastic career change due to recent job loss, but have been unable to do so at this time to the current lack of certainty and opportunities, as well as Keegan needing additional assistance. I am ineligible for unemployment.

19. Further, Affiant sayeth naught.




Lisa Knapp

Sworn to before me and subscribed in my presence this 28th day of August, 2020.



Madeline M. Lamb, Attorney At Law
NOTARY PUBLIC - STATE OF OHIO
My commission has no expiration date
Sec. 147.03 R.C.



Notary Public